

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)

v.)

JOHN RYAN)

CRIMINAL NO. 03-10372-NG

**DEFENDANT JOHN RYAN'S MOTION
FOR MODIFICATION OF RELEASE CONDITIONS
(NO OBJECTION BY GOVERNMENT OR PRETRIAL SERVICES)**

Defendant John Ryan ("Mr. Ryan") hereby moves the Court to modify his current release conditions as follows:

1. Mr. Ryan shall be removed from electronic monitoring. Mr. Ryan shall reside with his sister, Sheila Ryan, at 924 West End Avenue, Apt. # 21, New York City, New York 10025, until the date of his sentencing.

2. Mr. Ryan shall report to Pretrial Services as directed by them.

3. All previous conditions of release shall remain in effect.

The Pretrial Services Officer assigned to Mr. Ryan's case, Christopher Wylie, has reviewed this motion and has no objection to it.

The government also has reviewed this motion and also does not object to it, provided that Mr. Ryan follow the procedures outlined above.

WHEREFORE, Mr. Ryan respectfully requests that the Court order that Mr. Ryan's release conditions be modified as stated above.

Respectfully submitted,
JOHN RYAN
By his attorneys,

Karen A. Pickett

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DATED: April 30, 2004

*and Pretrial
Service*

CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of
the above document was served upon the
attorney of record for each party by mail by hand

Date: 4/30/04